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UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD DISTRIBUTION ADMINISTRATION  
Midwest Region  
Chicago 3, Illinois

December 29, 1943

TO: All State and Area Offices, Midwest Region

FROM: E. O. Pollock, Regional Director, Midwest Region

SUBJECT: Food Order Education Conference Minutes

The attached outlines of minutes are to enable participants at future conferences on Food Order Education to develop questions for discussion.

This outline should be studied in conjunction with Regional Director's Memorandum No. 24, dated December 24, 1943, which has been distributed.

It will be noted that field offices will have an increasing responsibility with respect to Food Order Compliance, as defined in the digest. Any questions regarding the general character of the general Food Order Education program or its application to any particular Food Order will be given prompt attention by the Regional Food Order Representative; however, all action matters now being handled by the various Regional Divisions and services will continue to be handled by them as heretofore.

Particular attention should be paid to the issue of screening cases to be handled by educational compliance methods from those to be handled by enforcement compliance through the Regional Compliance Division. General guides are indicated in the digest. It is hoped that these general guides may be made more specific in the light of future experience and with respect to facilities available thereunder. In the meantime, the best advice would seem to be to use the best of judgment within the general guides developed to date. It is hoped that further refinement of standards in classifying cases for handling by these two methods will be developed in discussion at forthcoming Food Order Education conferences.

Enclosures



UNITED STATES DEPARTMENT OF AGRICULTURE

FOOD DISTRIBUTION ADMINISTRATION

Midwest Region

Chicago 3, Illinois

December 29, 1943

DIGEST OF FOOD ORDER EDUCATION CONFERENCE (ILLINOIS-WISCONSIN)  
DECEMBER 20-21, 1943, BASED ON REGIONAL DIRECTOR'S MEMORANDUM  
NO. 24 (12-16-43)

1. Definition: Food Order Education is all those activities designed to influence those subject to or effected by Food Orders toward the maximum of compliance therewith, by
  - (a) positive violation prevention by field offices through order distribution, explanation, assistance; by maximum number of effective contacts upon individuals and groups through field office staff and cooperating industry;
  - (b) violation handling by field offices, but without enforcement effort, the latter being reserved to Regional Compliance Division (and generally with reference to the more important, flagrant, continuous, wilful cases; see 3(f) below.)
2. Methods:
  - (a) Lists of those subject to important, active orders per area constitute basis of contact action by FDA staff and industry cooperating units; R. L. Polk & Company lists supplemented by FDA license lists and other additions in aid of
    - (1) perfecting initial mailing lists;
    - (2) perfecting local contact lists.
  - (b) Classification of important, active orders deemed eligible for educational-compliance work; statement of general and specific actions desired in each order; manuals for important orders containing official data, order digest, enforcement compliance and educational compliance instructions, interpretations, industry relations, official order report forms, records, and educational activity reports.
  - (c) Supplemental distribution of order forms and other data (all orders.)
  - (d) Effective explanation and servicing through maximum number of educational contacts, individually and group by FDA staff or industry group (organized or unorganized) or jointly.
    - (1) Inquiry as to actual status of order compliance in areas and sub-areas.
    - (2) Inquiry as to specific violations and handling of same locally or by reference to Regional Compliance Division. (See 3(f) below.)
  - (e) Assistance in preparing petitions for relief from hardship; and in securing required reports.

- (f) Encouraging formation by industry of local industry advisory committees and, if appropriate, of industry compliance clearing house committees (see Bakery Products Manual for details); confidential relations to be established between the latter and FDA (confidential character of all violation relations and handling.)
- (g) Continuous appraisal of actual compliance status per order per area through educational contact inquiries, local industry leaders, industry advisory committees, industry compliance clearing house committees, business and trade organizations and press, official agencies (Federal, state, county, local.)
  - (1) Milk Marketing Administrators and agents authorized to share information re general compliance and to put FDA upon inquiry (confidentially) as to suspected violators of Food Orders.
  - (2) State, county, and local sanitary inspectors, as in case of slaughterhouses.
  - (3) Butter-fat test reports.
  - (4) Lists of licensees in businesses under Food Orders.
  - (5) County War Meat Committee re farm slaughterers.
  - (6) General public understanding and acceptance of Food Order restrictions through opportunities offered by:
    - a. County nutrition committees (special memorandum in preparation);
    - b. OCD;
    - c. Service clubs, women's clubs, etc.
  - (7) Other similar informational relations.
- (h) Use of local publicity media, through advance and subsequent prepared releases, but in harmony with Regional regulations.
- (i) Adequate and continued publicity (listings with Chambers of Commerce, service clubs, telephone companies, industry groups, etc.) regarding office location, hours, telephones, facilities and services available; plus adequate supplies of material (orders, questions and answers, and report forms.)
- (j) Use of facilities of Regional Commodity Specialists in advising on technical and business questions; securing answers for the public; assistance re petitions; and in requesting assistance of Regional



Food Order Representative in promotion of Food Order Education, meetings, speeches, expediting, and general help.

- (k) In general, by positive extension of effort, discovering possible violations as against receiving complaints, adjusting resources to productive results through inventiveness, imagination, ingenuity, and resourcefulness.

### 3. Administration:

- (a) Through existing channels
- (b) Commodity Specialists responsible for general content and emphasis of educational material, selection of eligible orders, assistance in educational projection through meetings and with industry help.
- (c) Field offices (state and area) primarily responsible for action and results -- with all possible assistance from Commodity Specialists and Regional Food Order Representative.
- (d) Regional Food Order Representative -- servicing and coordinating unit, liaison with Regional Compliance Division.
- (e) Reports of educational activity; (ED-MW-1 "Visitations" and ED-MW-2 "Meetings") are made in duplicate, one copy retained and one copy forwarded to state office as a part of regular semi-monthly report thereto. State office assembles data from these two reports into a statistical summary (ED-MW-3) as a part of the State Supervisors' semi-monthly report to the Regional Director. The Regional Compliance Division has specified Form (FDA-MW-1) in forwarding violation cases to it for attention.
- (f) Screening educational compliance cases for local handling (Class A), from enforcement compliance cases for reference to the Regional Compliance Division (Class B.)

- (1) Most cases in Class A; as a general guide. This includes all "minor" violations, such as failure to keep records or to make reports; infractions of "secondary" features of orders, such as use of prohibited equipment in FDO No. 1; minor infractions due to ignorance or to not having received or properly understood a Food Order.

Class B cases include:

- (1) Those originally classified as (A) cases but which fail to respond (note that some cases originally classified as (B) cases and referred to the Regional Compliance Division may

be reclassified by the latter as (A) cases and returned to the originating field office for handling.)

- (2) Wilful, persistent, flagrant violations.
- (3) Original warning letter cases; and where a warning letter has heretofore been issued.
- (4) Cases requiring audit.
- (5) Cases requiring a large amount of time or covering an extensive area.

Cases referred to the Regional Compliance Division will be handled solely by it except as it may request information or other assistance.

All cases should be handled and handled confidentially, whether

- (1) received by FDL office as a violation report;
- (2) obtained through positive or searching inquiry;
- (3) transmitted (informally) from local industry compliance clearing house committee;
- (4) handled locally through educational effort;
- (5) transferred to the Regional Compliance Division for handling by it;

in order to cover the entire compliance front and to keep those firms and individuals currently in compliance from joining those not in compliance.